

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| ABELARDO MORA, | : | 07 Civ. 8168 |
| | : | |
| Plaintiff, | : | Hon. Denise Cote |
| | : | |
| v. | : | ECF Case |
| | : | |
| UNITED COLLECTION BUREAU, INC, | : | |
| | : | |
| | : | |
| Defendant. | : | |
| ----- | X | |

FED. R CIV. P. 26(F) CONFERENCE REPORT

Plaintiff Abelardo Mora ("Plaintiff") and defendant United Collection Bureau, Inc. ("Defendant"), through their respective undersigned counsel, respectfully submit this Conference Report pursuant to Federal Rule of Civil Procedure 26(f).

I. Settlement Efforts.

Plaintiff has extended a settlement offer that was rejected by Defendant. Based on Defendant's position that it will not pay more than \$5,000 to settle the case, the parties agree that there is a low possibility of reaching a mutually agreeable resolution at this juncture.

II. Initial Disclosures.

The parties will serve initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) by February 8, 2008.

III. Fact Discovery.

The parties agree to make good faith efforts to complete fact discovery by August 1, 2008. Plaintiff believes that he has a good faith basis for concluding that Defendant's abusive debt collection practices are widespread and may support a class action. Plaintiff reserves his right to seek an extension of the fact discovery deadline if information obtained in discovery reveals a basis for a class action and he elects to offer other aggrieved individuals the right to join a class against Defendant.

IV. Discovery Limitations.

The parties propose no changes to the standard discovery limitations established by the Federal Rules of Civil Procedure and the local rules of this Court.

V. Joining Parties and Amending Pleadings.

As Plaintiff believes that there is a good possibility that he will seek to convert this lawsuit into a class action, he reserves the right to amend his pleadings after taking appropriate discovery.

Dated: New York New York
January 31, 2008

Respectfully Submitted,

s/ Brian A. Burns

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